

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION**

IN RE: PAVEL S KHATULEV ASHLEY E KHATULEV Debtors))))))	CASE NO: 23-20091 Chapter 13 Trustee's Objection to Confirmation Original Confirmation Hearing set for : August 31, 2023 11:00 am
--	----------------------------	--

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The Debtor has not filed 2022 pre-petition tax returns. 11 U.S.C. § 1325(a)(9).
2. Debtors should provide the Trustee with a copy of the 2022 Federal and State income tax returns after they have been filed with the taxing authorities.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: July 20, 2023

OBJCONF--JMP

/s/ Jennifer M. Pontus

Jennifer M. Pontus MO65660

Attorney for Trustee

P.O. Box 430908

St. Louis, MO 63143

(314) 781-8100 Fax: (314) 781-8881

trust33@ch13stl.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on July 20, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on July 20, 2023.

PAVEL S KHATULEV
ASHLEY E KHATULEV
1580 HWY 161
MONTGOMERY CITY, MO 63361

23-20091

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

07/20/2023

Page 2 of 2

/s/ Jennifer M. Pontus

Jennifer M. Pontus MO65660